

*(Stipulating Parties Listed on Signature Pages)*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO**

**In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

Case No. 07-5944 SC  
MDL No. 1917

## This Document Relates to:

**STIPULATION AND [PROPOSED]  
ORDER ENLARGING DIRECT  
ACTION PLAINTIFFS' TIME TO  
FILE OPENING BRIEFS REGARDING  
PORTIONS OF SPECIAL MASTER'S  
MAY 2, 2013 REPORT AND  
RECOMMENDATIONS ON MOTIONS  
TO DISMISS DIRECT ACTION  
COMPLAINTS SPECIFIC TO  
SAMSUNG ELECTRONICS  
COMPANY, LTD. AND SAMSUNG  
ELECTRONICS AMERICA, INC.**

*Electrograph Systems, Inc., et al. v. Hitachi, Ltd., et al.*, No. 11-cv-01656;

*Stoebner, et al. v. LG Electronics, et al.*, No. 11-cv-05381;

*Siegel v. Hitachi, Ltd., et al.*, No. 11-cv-05502:

*Best Buy Co. Inc. et al v Hitachi Ltd et al*

No. 11-cv-05513;

*Target Corp, et al. v. Chunghwa Picture Tubes, Ltd., et al.*, No. 11-cv-05514;

*Interbond Corporation of America v. Hitachi, et al.*, No. 11-cv-06275;

*Office Depot, Inc. v. Hitachi Ltd., et al.,*  
No. 11-cv-06276;

*CompuCom Systems, Inc. v. Hitachi, Ltd., et al.*, No. 11-cv-06396;

*Costco Wholesale Corporation v. Hitachi, Ltd., et al.*, No. 11-cv-06397;

*P.C. Richard & Son Long Island Corporation, et al., v. Hitachi, Ltd., et al., No. 12-cv-02648:*

*Schultze Agency Services, LLC, et al. v.  
Hitachi Ltd. et al.* No. 12-cv-02649

1           WHEREAS, there is pending in the United States District Court for the Northern District  
 2 of California a multidistrict consolidated proceeding comprised of actions brought on behalf of  
 3 purported purchasers of cathode ray tube (“CRT”) products, captioned as *In re: Cathode Ray*  
 4 *Tube (CRT) Antitrust Litigation*, Case No 3:07-cv-05944 SC (MDL No 1917) (the “MDL  
 5 Proceedings”); and

6           WHEREAS, Direct Action Plaintiffs (“DAPs”) filed complaints<sup>1</sup> (“Complaints”), that list  
 7 Samsung Electronics Company, Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEAI”)  
 8 among the defendants; and

9           WHEREAS, the Complaints assert certain claims under federal and various states’ laws  
 10 against SEC and SEAI based on an alleged conspiracy to fix the prices of CRTs from March 1,  
 11 1995 to November 25, 2007 (“DAPs’ CRT Claims”);

12          WHEREAS, Special Master Charles A. Legge recommended that the Complaints against  
 13 SEC and SEAI be dismissed with leave to amend on May 2, 2013 (“Report and  
 14 Recommendations”) [Dkt. No. 1664]; and

15          WHEREAS, on May 9, 2013, this Court entered an order granting the parties’ Stipulation  
 16 Regarding Special Master’s May 2, 2013 Report and Recommendations on Motions to Dismiss  
 17 Direct Action Complaints [Dkt. No. 1666], requiring that opening briefs in support of objections  
 18 to portions of the Report and Recommendations be filed on or before May 31, 2013;

19          WHEREAS, SEC and SEAI have agreed to grant DAPs an additional 7 days to file  
 20 opening briefs in support of their objections, if any, to portions of the Report and  
 21 Recommendations specific to SEC and SEAI;

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22          <sup>1</sup> Specifically, this Stipulation relates to the following complaints: *Stoebner v. LG Electronics,*  
 23 *Inc.*, No. 11-cv-05381 (N.D. Cal.) [Dkt. No. 1] (Nov. 7, 2011); *Target Corp. v. Chunghwa*  
*Picture Tubes, Ltd.*, No. 11-cv-05514 (N.D. Cal.) [Dkt. No. 9] (Jan. 6, 2012); *P.C. Richard & Son*  
*Long Island Corp. v. Hitachi, Ltd.*, No. 12-cv-02648 (N.D. Cal.) [Dkt. No. 1] (Nov. 14, 2011);  
*Schultze Agency Servs., LLC v. Hitachi, Ltd.*, No. 12-cv-02649 (N.D. Cal.) [Dkt. No. 1] (Nov. 14,  
 2011); *CompuCom Systems, Inc. v. Hitachi, Ltd.*, No. 11-cv-06396 (N.D. Cal.) [Dkt. No. 1] (Nov.  
 14, 2011); *Interbond Corp. of Am. v. Hitachi, Ltd.*, No. 11-cv-06275 (N.D. Cal.) [Dkt. No. 1]  
 (Nov. 14, 2011); *Costco Wholesale Corp. v. Hitachi, Ltd.*, No. 11-cv-06397 (N.D. Cal.) [Dkt. No.  
 1] (Nov. 14, 2011); *Siegel v. Hitachi, Ltd.*, No. 11-cv-05502 (N.D. Cal.) [Dkt. No. 1] (Nov. 14,  
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 2011); *Best Buy Co., Inc. v. Hitachi, Ltd.*, No. 11-cv-05513 (N.D. Cal.) [Dkt. No. 1] (Nov. 14,  
 2011); and *Electrograph Systems, Inc. v. Hitachi, Ltd.*, No. 11-cv-01656 (N.D. Cal.) [Dkt. No. 5]  
 (Mar. 10, 2011).

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the  
2 undersigned counsel, on behalf of their respective clients, that subject to the Court's approval, the  
3 time for DAPs to file their opening briefs in support of their objections, if any, to portions of the  
4 Report and Recommendation specific to SEC and SEAI is extended to and including June 7,  
5 2013. This stipulation is entered into without waiver of any parties' respective rights, claims, or  
6 defenses.

7 **IT IS SO STIPULATED.**

8  
9 Dated: May 30, 2013

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18  
19 Dated: May 30, 2013

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7                   *Electronics, LLC and Related Entities; and*  
8                   *Douglas A. Kelley, as Chapter 11 Trustee for*  
9                   *Petters Company, Inc. and Related Entities, and*  
10                  *as Receiver for Petters Company, LLC and*  
11                  *Related Entities*

12  
13                  **Pursuant to Local Rule 5-1(i)(3), the filer attests that concurrence in the filing of this**  
14                  **document has been obtained from the signatories.**

15  
16                  PURSUANT TO STIPULATION, IT IS SO ORDERED.  
17                  Dated: \_\_\_\_\_

18                  \_\_\_\_\_  
19                  Hon. Samuel Conti  
20                  United States District Judge  
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